



PL.10.80.003 | Revision 03 Supplier Code Of Conduct Policy

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Türk Hava Yolları A.O. ("Turkish Airlines") declares its Supplier Code of Conduct Policy to guide all the suppliers it cooperates with and to draw attention to the principles of the [Code of Business Conduct and Ethics Manual](#) during the activities such as passenger transportation, cargo transportation and training activities it carries out in accordance with the national and international standards.

The basis of the Supplier Code of Conduct Policy set out in this document is Turkish Airlines [Code of Business Conduct and Ethics Manual](#). Our Incorporation expects all its suppliers to comply with the principles of the [Code of Business Conduct and Ethics Manual](#) within the scope of the applicable law and Turkish Airlines procedures.

Turkish Airlines aims to cooperate with the suppliers that will further improve its sustainability performance in the supply chain. To this end, the Supplier Code of Conduct Policy outlines the minimum standards of conduct for all suppliers. Turkish Airlines expects its suppliers to comply with the Supplier Code of Conduct Policy, which it has published in addition to quality aspects and commercial issues, with due diligence, and establish an open dialogue about all difficulties encountered by conducting a transparent operation.

Compliance with Laws

Turkish Airlines considers compliance with the international and local laws and regulations in all countries where it operates as one of its primary duties. This situation is also stated in Article 5. Compliance with Laws of the [Code of Business Conduct and Ethics Manual](#). As part of our corporate responsibility, Turkish Airlines expects the suppliers with whom it cooperates to comply with all international and local laws and regulations, including the countries where they operate or provide services.

Respecting Human

Rights Turkish Airlines considers respecting human rights and providing services in accordance with the international labor standards as its basic principle. In all its activity areas, it regards the health, safety, respectability, and wellness of its employees, customers, business partners, contractors, and everybody who may be affected by our activities as its top priority. It also expects its suppliers to protect human rights, provide services in accordance with the international labor standards, and create a work environment that respects human rights.

Equality-Fair Treatment

In accordance with the principle of Equality and Fair Treatment that is based on article 1.1 Honesty and Fair Dealing of the [Code of Business Conduct and Ethics Manual](#), Turkish Airlines expects its suppliers to treat their employees with dignity, respect, and fairness regardless of race, color, religion, gender, age, and create an inclusive work environment.

As stated in the article of 6.2 Equal Opportunity and Nondiscrimination of the [Code of Business Conduct and Ethics Manual](#), Turkish Airlines does not tolerate discrimination. It also expects its suppliers not to tolerate discrimination based on race, national, ethnic or social origin, caste, birth, religion, disability, gender, family responsibilities, marital status in recruitment, remuneration, access to training, promotion, dismissal, or retirement.

Turkish Airlines expects its suppliers to treat all employees with dignity, respect, and fairness. Suppliers are required to establish and maintain an inclusive workplace free from discrimination and harassment, ensuring equal opportunity and fair treatment for all employees regardless of race, color, religion, gender, or age, in line with International Labour Organization (ILO) Convention C111. Suppliers must also implement effective mechanisms to prevent and address such issues and **are expected to respect and support freedom of association and the right to collective bargaining.**

Turkish Airlines expects its suppliers to listen to the complaints of their employees, and establish an appropriate communication and complaint method to resolve them.

Child Labor and Illegal Employment

Turkish Airlines expects its suppliers to act in compliance with national and international legal and other requirements (as defined in International Labour Organization (ILO) Conventions C138 and C182) regarding the use of child labor. In accordance with the legislation of all countries in which operations are conducted, suppliers are expected to comply with the minimum employment age defined by law or regulation, and with the relevant International Labour Organization (ILO) standards. Turkish Airlines expects its suppliers to act in compliance with national and international legal and other requirements (as defined in International Labour Organization (ILO) Conventions C138 and C182) regarding the use of child labor. In accordance with the legislation of all countries in which operations are conducted, suppliers are expected to comply with the minimum employment age defined by law or regulation, and with the relevant International Labour Organization (ILO) standards.

Forced Labor, Modern Slavery, and Human Trafficking

Within Turkish Airlines, no employee shall be forced to work without their consent, with their legal rights restricted. It is essential that employees work with respect for their free will and legal rights. Turkish Airlines expects the same sensitivity from its suppliers. It strongly



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demands that none of the suppliers' employees be made to work without consent, with their legal rights restricted, or in violation of the law.

Turkish Airlines commits to combating human trafficking, including all forms of modern slavery such as forced and compulsory labor, with determination, and undertakes to take all necessary measures in this regard. It expects its suppliers to take all necessary measures completely.

Turkish Airlines absolutely expects its suppliers, while conducting their operations, products, and services, to fully comply with the Supplier Code of Conduct Policy stated in this document, the annually published Modern Slavery Statement, and all national and international regulations in force regarding modern slavery, human trafficking, occupational health and safety, respect for human rights, equality, and the prohibition of child labor.

Wages and Working Hours

Turkish Airlines expects suppliers to pay their employees the minimum wage determined by the laws in the regions where they operate, and comply with the legal working hours.

It expects them to make sure that all rights determined by labor law and the other relevant legislations, which the employees will benefit from, especially annual leave, overtime, and maternity leave, are used in accordance with the laws and regulations.

Compliance with Sanctions and Trade Restrictions

Turkish Airlines attaches importance to complying with all applicable economic and trade sanctions, the laws and regulations related to export and import restrictions, especially the United States and European Union sanctions and export restrictions legislations which the transfer of certain technical data, equipment, and technologies between countries is subject to.

It expects its suppliers also to understand the export control laws and economic sanctions requirements of the countries where they operate, and carry out their export activities in each country in accordance with the applicable laws and regulations. The other liabilities related to sanctions and trade restrictions are available under 8. Sanctions and Trade Compliance heading of the [Code of Business Conduct and Ethics Manual](#).

Bribery and Corruption

The Bribery and Corruption subject is covered under 10.1 Anti-Bribery and Corruption heading of the [Code of Business Conduct and Ethics Manual](#). According to this regulation, Turkish Airlines employees or third parties may not be provided with bribery, commission, exemption, or any other benefit under any other name whatsoever. It also expects its suppliers not to offer or accept bribes, kickbacks, or gifts or payments that could be perceived as illegal, improper, or unauthorized payment.

In line with the regulations of the [Code of Business Conduct and Ethics Manual](#) Chapter 9 Anti-Money Laundering and the article of 10.1 Anti-Bribery and Corruption, the suppliers must not be involved in any action related to corruption, abuse or money laundering. It expects its suppliers to implement zero tolerance practices in this regard, and in particular, to carry out the necessary investigations and an appropriate risk management planning within the scope of any business initiative they will provide to Turkish Airlines.

Turkish Airlines expects its suppliers to refrain from using gifts, entertainment, or other commercial hospitality to gain an unfair competitive advantage, and from the entertainment activities that do not comply with the applicable laws, and exceed their purposes. The acceptance of gifts, invitations, credits, and other favors is covered under 10.2 Gifts, Entertainment, and other Business Courtesies heading of the [Code of Business Conduct and Ethics Manual](#).

Conflict of Interest

The Conflict of Interest subject is covered under 10.3 Avoiding Conflicts of Interest heading of the [Code of Business Conduct and Ethics Manual](#). It expects its suppliers to take the necessary measures to ensure that they do not have any personal interests in their relations with Turkish Airlines and that the supplier's duties towards Turkish Airlines do not conflict with each other, or that there is no situation that may be perceived as a conflict of interest by the third parties. In the event of a potential conflict of interest, Turkish Airlines expects the supplier to notify all the affected parties promptly.

Fair Competition

While carrying out its activities, Turkish Airlines encourages fair competition and supports the development of competition law in line with the regulations in the Article 11. Fair Dealing and Fair Competition of the [Code of Business Conduct and Ethics Manual](#). In this context, it expects all its suppliers to act in accordance with the local laws and international standards, and stay away from the activities restricting competition, unfair competition methods, and deceptive acts.

Occupational Health and Safety

All companies serving Turkish Airlines are liable to comply with the rules specified under the Occupational Health and Safety Law No. 6331 and its related regulations and the heading 6.5 Maintaining a Safe and Secure Workplace of the [Code of Business Conduct and](#)



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[Ethics Manual](#) in line with the national and international legislation and the rules and regulations of the Company. It encourages its suppliers to hold ISO 45001 Occupational Health and Safety Management System Certificate or an equivalent certificate.

Turkish Airlines expects its suppliers to take all preventive and protective measures to prohibit work accidents and harm to employee health, to support activities to raise safety awareness, and to work towards reducing work accidents and occupational diseases.

Protection of Environment

Turkish Airlines expects its suppliers to comply with the Environmental Legislation, national and international requirements that they are obliged to comply with while carrying out their activities, products and services, to be proactive in minimizing environmental impacts and to adopt a zero tolerance approach to illegal wildlife trade. It encourages its suppliers to have an Environmental Management System Certificate in order to eliminate, minimize and keep under control their significant environmental impacts.

Turkish Airlines expects its suppliers to comply with the commitments set forth in the [Environmental Policy](#) , [Biodiversity Policy](#) and [Sustainability Policy](#), and the rules set forth under the heading 12. [Sustainability of the Code of Business Conduct and Ethics Manual](#).

Additionally, Turkish Airlines expects its suppliers to support fuel efficiency initiatives aimed at reducing and eliminating factors that may contribute to climate change. Suppliers are expected to take proactive measures to conserve natural resources, promote recycling and reuse, and prevent pollution. They are encouraged to support renewable energy projects and practices that enhance resource and energy efficiency while reducing consumption and greenhouse gas emissions. Suppliers are required to identify the environmental aspects and impacts resulting from all their operations, products, and services, and to develop action plans to prevent, reduce, or, where possible, eliminate adverse environmental impacts at their source throughout the entire life cycle. Turkish Airlines also expects its suppliers to act with awareness of their impact on local pollution and to implement measures to prevent noise pollution, water emissions, odor emissions, and waste generation. Suppliers are further expected to take measures to protect ecosystems and biological diversity.

Keeping Books and Records Correctly

Turkish Airlines expects its suppliers keep any books and records, including all financial transactions and information regarding their business activities, work, health and safety, and environmental practices, and the reports, presentations, financial statements, and footnotes to be submitted to the competent authorities correctly, completely, and transparently in accordance with the relevant laws, policies and procedures. Other issues related to keeping books and records correctly are included under the [Code of Business Conduct and Ethics Manual](#) heading 10.8 Truthful and Accurate Reporting.

Protection of Personal Data and Confidentiality

Turkish Airlines stipulates its suppliers to take the necessary measures in compliance with the principles, rules, and procedures prescribed in the national and international personal data protection legislations it is subject to, the Personal Data Protection Law Number 6698 in particular, and including the European Union General Data Protection Regulation. The regulations regarding the protection of personal data and privacy are included under the [Code of Business Conduct and Ethics Manual](#) heading 7 Protecting Confidential Information.

It expects its suppliers to take care of any information that belongs to Turkish Airlines such as trade secret, critical data, confidential information, and personal data in compliance with the relevant legislation, and take any technical and administrative measures to ensure the security level required to retain such information in compliance with the relevant legislative provisions.

The supplier signs the contracts and protocols to be sent to him/her by Turkish Airlines to provide the necessary protection regarding the processing of personal data and confidentiality. In the event that the suppliers outsource the service to be provided to Turkish Airlines to third party companies, Turkish Airlines expects the relevant companies to undertake protection to the same standard, and make the relevant third parties sign the contracts and protocols that comply with the legislation on the protection of personal data.

Turkish Airlines expects its suppliers to prevent unlawful access to any data by its employees or third parties as well as the unlawful use of the related data other than for the purpose of their transfer.

It expects the suppliers to transfer the personal data of their own employees and subcontractors, if any, that they transfer/will transfer to Turkish Airlines by providing a legal infrastructure in accordance with the relevant legislation.

Turkish Airlines expects its suppliers to take commitments regarding confidentiality and access to personal data from its own employees and subcontractors, if any, who have/will have access to personal data under the responsibility of Turkish Airlines Inc., and provide periodic training to their employees on the protection of personal data and information security.

The supplier knows that it is responsible for the damages that may arise as a result of the activities of its employees or sub-contractors, if any, in violation of the personal data protection legislation.

Information Abuse



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As specified in the article 10.3.3 Personal Business Relationships, Investments, and Insider Trading of the [Code of Business Conduct and Ethics Manual](#), Turkish Airlines does not tolerate the use of any important information or information not disclosed to public for trading or allowing trading of any company's shares or securities by others by the suppliers.

Reporting

This Policy, which we as Turkish Airlines have published, is a brief guide, and does not cover all the necessary legal and ethical standards. In case of any violation of this document or other applicable legislation, Turkish Airlines expects the suppliers to report this situation to us immediately. This reporting can be done through the supplier's purchasing contact person or the ethical violation reporting channel etikkurul@thy.com. Turkish Airlines may reconsider its relationship with a supplier that does not comply with the Supplier Code of Conduct Policy and fails to meet the minimum requirements.